

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Miyano Machinery USA Inc.,)
)
Plaintiff,)
)
 v.)
)
MiyanoHitec Machinery, Inc.,)
Thomas (“Tom”) Miyano, a/k/a)
Toshiharu Miyano and)
Steven Miyano, a/k/a)
Shigemori Miyano,)
)
Defendants.)
MiyanoHitec Machinery, Inc.,)
Thomas (“Tom”) Miyano, a/k/a)
Toshiharu Miyano and)
Steven Miyano, a/k/a)
Shigemori Miyano,)
)
Counterclaimants,)
)
 v.)
)
Miyano Machinery, Inc. and)
Miyano Machinery USA Inc.,)
)
Counterdefendants.)

JURY TRIAL DEMANDED

NOTICE OF MOTION

Please Take Notice that on Thursday, August 7, 2008 at 9:00 a.m. or as soon thereafter as counsel may be heard, Defendants MiyanoHitec Machinery, Inc., Thomas (“Tom”) Miyano, and Steven Miyano (“MIYANOS”) shall appear before the Honorable Magistrate Judge Nan R. Nolan in the courtroom usually occupied by her in the United States District Court for the

Northern District of Illinois, 219 South Dearborn St., 18th Floor, Chicago, Illinois, to present
THE MIYANOS' MOTION TO COMPEL RESPONSES TO DISCOVERY.

Dated August 4, 2008

Respectfully submitted,

/s/ Geoffrey A. Baker
Robert M. Karton
ROBERT M. KARTON, LTD.
77 W. Washington St., Suite 900
Chicago, Illinois 60602-2804
(312)214-0900 telephone
(312)214-4230 facsimile
robert@karton.us

Vernon W. Francissen
FRANCISSEN PATENT LAW, P.C.
FRANCISSEN PATENT LAW, P.C.
53 W. Jackson Blvd., Suite 1320
Chicago, Illinois 60604
(312)294-9980 telephone
(312)275-8772 facsimile
vern@francissenpatentlaw.com

Geoffrey A. Baker
Anthony E. Dowell
Geoffrey D. Smith
Dowell Baker, P.C.
201 Main Street, Suite 710
Lafayette, Indiana 47901
(765) 429-4004 telephone
(765) 429-4114 facsimile
gabaker@dowellbaker.com
gsmith@dowellbaker.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing NOTICE OF MOTION was filed via the Court's ECF system and thus also sent by email on August 4, 2008 to the following:

Edward D. Manzo
COOK, ALEX, MCFARRON, MANZO,
CUMMINGS & MEHLER, LTD.
200 West Adams Street, Suite 2850
Chicago, IL 60606

Phone: (312) 236-8500
Fax: (312) 236-8176

emanzo@cookalex.com

August 4, 2008

/s/Geoffrey D. Smith